

CEDAR COUNTY NEBRASKA E911

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August 11, 2005

Nebraska Public Service Commission
1200 N Street – 300 the Atrium
Lincoln, NE 68509-4927

RE: E911 Service In Nebraska PSC # 911-014/PI-99

To Whom It May Concern:

These comments are in response to the PSC request for comment on Nebraska Legislature resolution 143 for the interim Study of 911 service in Nebraska.

Cedar County Nebraska implemented E911 service in October 1996. Currently this E911 service continues without interruption within Cedar County. Our neighboring counties of Dixon and Wayne Counties followed suite implementing E911 several years later. Knox County our neighbor to the west has basic 911 service and is in the process of trying to implement E911 service in the very near future.

Currently the PSAP (Public Safety Answering Point) at Cedar County fields an average of 110 calls per month at minimum on it's E911 system. These numbers are steadily increasing. Although current year to date statistics are not available at the time of this letter it is expected that the numbers will reflect a significant increase in the number of calls our PSAP handles. This is due in part to the implementation of wireless E911 and the amount of wireless phones being used within the County when compared to wire line phones.

Currently Cedar County imposes a surcharge of \$1.00 per month per line to help fund it's E911 system. For the first time in history, this budget year the surcharge funds will be insufficient to cover the expenses incurred with the operation of E911 within Cedar County. As more Wireless infrastructure is constructed in our area many people are switching to a wireless phone in lieu of the traditional wire line phone. Many people find that having two telephones is not economical and elect to have a wireless phone only for financial reasons where wireless coverage permits.

Cedar County currently subscribes to Phase I wireless service for wireless E911. All wireless towers located within the geographic area served by our PSAP are set to route wireless E911 calls to our PSAP. The number of wireless Phase I calls received are on the rise.

Cedar County wishes to offer Phase II wireless E911 services, however because of the costs involved Cedar County is unable to afford to implement Phase II at this time. Cedar County does not anticipate sufficient revenue to implement and maintain wireless Phase II by it's own accord at this time or in the future.

Discussion has been held concerning the consolidation of PSAP within the State of Nebraska in an effort to minimize the cost of both wire line and wireless E911 service within the State. The fact that consolidation may save money is undisputed, however the theory that bigger is not always better applies here. Consolidation of PSAP in rural areas like ours is a disservice to the users of the system. All too often the larger PSAP lacks knowledge of an area it serves, lacks the appropriate quantity of dispatchers to handle the work load, and lacks the spirit of cooperation to work with others.

When it comes to E911, the local dispatchers at the PSAP know the area they serve the best. These people live and work in the area they are responsible for. They travel the local roadways, know the local landmarks, and they know the people. These are things that in the time of an emergency can make the difference between life and death. Perhaps consolidation makes sense in the bigger area that have two or more PSAP within one county. For the smaller rural areas that have only one PSAP in their County, consolidation makes very little sense.

Nebraska needs to develop specific regulations with specific penalties for misuse regarding the use of E911 surcharge funds in order to guarantee the future of E911 within the State. In many other states, E911 surcharge funds are used for everything but E911. Nebraska has been fortunate that such squanderous ways are not common place, however our luck will run out one day without specific regulations governing these funds. The current regulations are loosely construed and lack the teeth to handle violations of the statute.

In Wireless E911 the carriers must be reimbursed for their expenses of E911 implementation. The age old question still lingers of who is responsible for those expenses. Some will argue that expenses relating to the E911 implementation are part of business and should be absorbed through the normal course of business by the wireless company. Some will argue that the surcharge funds should provide for reimbursement of all wireless carrier expenses. If these companies are in business, they must comply with the FCC mandate. Implementation of E911 service infrastructure by these carriers should be a normal business expense and not be reimbursed by the wireless surcharge fund, however the recurring cost for providing the service to the PSAP should be covered by the surcharge fund to insure integrity and longevity of the service.

If the current trend continues, changes will need to be made in the amount and distribution of the current surcharge fees collected. Oversight will need to be given to be sure that funds are spent properly. Nebraska needs to move ahead and do what it takes to implement Phase II E911 service for the good of the public.

Sincerely,

Kevin Garvin